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## **ORIGINAL**

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January 12, 2006

BY FAX: (718) 260-2427 Honorable Frederic Block United States District Judge (E.D.N.Y.) 225 Cadman Plaza East Brooklyn, NY 11201

> Re: United States v. Cean Wade Docket No. 1:05-cr-00739-FB

Dear Judge Block:

I represent defendant Cean Wade in the above-referenced matter. Mr. Wade is currently out on pre-trial release and awaits sentencing by your Honor. As part of the conditions of Mr. Wade's pre-trial release, his travel is restricted to New York City. The purpose of this letter is to request Court authorization for Mr. Wade to travel to North Carolina. Mr Wade relates that he intends to visit his grandmother who suffered a stroke, and whose condition is rapidly deteriorating.

If permitted to travel, Mr. Wade would be accompanied by his infant daughter and his father, Doug Wade. The proposed itinerary is as follows: On January 14, 2006, Mr. Wade and his party would fly out of Newark Airport to Raleigh, North Carolina at 2:40 p.m., aboard Continental Airlines flight 3230. From Raleigh, they would proceed by car to Fayetteville, North Carolina, where Mr. Wade's grandmother, Anne Doris Wade, resides at The Woodlands nursing facility. Mr. Wade has invitations to stay at the homes of various relatives while in Fayetteville. On January 16, 2006, Mr. Wade would return aboard Continental Airlines flight 1538, which is scheduled to land at Newark Airport at approximately 5:26 p.m.. From the airport he would proceed directly home.

I have contacted A.U.S.A. Coyne and Pretrial Services Officer Ali, and I have informed them of my intention to make this application on Mr. Wade's behalf. Both parties have consented.

Thank you for your Honor's attention to this matter. If there are any questions or if additional information is required, please contact me at your convenience.

Respectfully submitted,

STEVEN ZACHARY LEGON